

2067 william Sanko1.txt

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1 DPONENT
2 being first duly sworn, as hereinafter
3 certified, was examined and testified as
4 follows:

5 - - - - -
6 CROSS-EXAMINATION

7 BY 6789:

8 Q Can you please state your name.

9 A It's Bill Sanko, William John Sanko.

10 Q Can you please state your address and
11 telephone number.

12 A The address is 6590 Jamelia Court,
13 Fairview, Pennsylvania. Phone number is
14 814-474-1517.

15 Q Mr. Sanko, I will be asking you a series of
16 questions today. After I'm done, Mr. Gutkin
17 will likely then ask you some more questions.
18 If you do not understand a question, please tell
19 us --

20 A Okay.

21 Q -- and we will either clarify the question
22 or repeat it for you.

23 A All right.

24 Q Is that acceptable?

25 A Yes.

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1 Q Great. Mr. Gutkin may object to a question
2 I ask, I may object to a question that

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16 get my objection in --

17 THE WITNESS: Okay.

18 1234: -- and then you can

19 answer, otherwise it makes it hard for the

20 reporter.

21 THE WITNESS: Okay.

22 Q Do you have any idea -- strike that.

23 - - - - -

24 (Discussion had off the record.)

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1 6789: Back on the record,

2 please.

3 BY 6789:

4 Q Is there any reason why you believe your
5 lamination -- laminators that you designed in
6 the '80s could not be used to laminate a plastic
7 card that had a chip or antenna between two
8 plastic layers?

9 1234: Object to form.

10 A It's apparent to me only now, in
11 retrospect, I have to plead -- I had -- I am now
12 pleading ignorance because I didn't know how
13 plastic cards were made, or smart cards were
14 made. I know now generalities about Keith's
15 patents or his applications that involve the use
16 of these counterbalanced platens and softening
17 the plastic. Now, I can say my laminators would
18 not have worked to make those kinds of cards,

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19 they would have had to be -- they would have had
20 to be modified, but only now would I know that.
21 Q why -- you tested -- why is it though your
22 laminators would not have worked?
23 A well, most of those plat -- most of those
24 presses, to begin with, were multiple platen
25 presses with accumulated weight on the bottom

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1 platens, and it -- with regard to Keith's
2 design, it sounds like to me he wants the
3 pressure the same on all the platens all the
4 time. I'm not saying he maintains it, I'm not
5 saying he changes it, he just doesn't want that
6 pressure different on one versus the other.
7 That's the reason for the multiple platens.

8 I guess I kind of thought, without
9 really thinking about it, was my linear
10 laminator capable of making smart cards? I
11 would have said yes. Is it? Not on the basis
12 of what I know now. And I guess I don't know
13 anything. Like I said, I've never read that
14 patent, I'm only going by generalities, with
15 regard to those generalities, my laminator could
16 not do that.

17 Q I'm not asking about functioning --

18 A Okay.

19 Q -- cards, I don't care if the chip would
20 have broken or the antenna would have been
21 damaged somehow, if possible.

22 A Okay.

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23 Q Is there any reason that you're aware of
24 that the laminators that you designed in the
25 '80s --

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1 A Okay.

2 Q -- could not be used to laminate plastic
3 cards having a chip or an antenna between two
4 plastic sheets?

5 A Just the way --

6 1234: Object -- object to
7 form.

8 A Just the way I designed them?

9 Q Um-hum.

10 A Yeah, they couldn't be.

11 Q They couldn't be?

12 A Yeah, because, I mean, really, when you're
13 talking about producing a product, you want that
14 product to come out successful, so it's the
15 success of that product or lack of it that would
16 determine whether or not you could do it, and
17 with my equipment, it couldn't be done, not by
18 what I know now.

19 Q And why was that?

20 A You get failure in the electronics.

21 Q Because of --

22 A Accumulated pressure, temperatures. I
23 couldn't vary the temperature. I had no ability
24 to do that. I'm assuming that's required.

25 All my laminators, single stacks, they

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1 all had that accumulated pressure. I mean, if
2 you're going to wind up with a 75 or 80 percent
3 failure rate on your cards, you're not going to
4 want to do it. Nobody can stay in business and
5 lose that kind of product. So can -- will my
6 product -- will my laminator do it? No. Not to
7 the best of my knowledge.

8 Q Let's put aside for a moment the yield
9 rate.

10 A okay.

11 Q Let's assume I don't care about --

12 A yield.

13 Q -- yield.

14 A You don't care if you get one good one.

15 Q That doesn't matter to me.

16 A okay.

17 Q Could the laminators that you designed in
18 the '80s have laminated cards with a chip or
19 antenna between plastic sheets?

20 1234: Object to form.

21 THE WITNESS: Sorry.

22 A I don't know. I don't know.

23 Q Is there any reason that you know of why
24 they could not be?

25 1234: Same objection.

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1 A They just didn't have the ability to vary
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